

By electronic mail to: [IANAFunctions@ntia.doc.gov](mailto:IANAFunctions@ntia.doc.gov)

July 29, 2011

Fiona M. Alexander  
Associate Administrator  
Office of International Affairs  
National Telecommunications and Information  
Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W., Room 4701  
Washington, DC 20230



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Re: Nokia Siemens Networks Response to NTIA Request  
for Comments on the Internet Assigned Numbers  
Authority (IANA) Functions/Further Notice of  
Inquiry [Docket No. 110207099-1319-02] [RIN  
0660-XA23]

Dear Ms Alexander,

Nokia Siemens Networks appreciates the continued open and inclusive approach NTIA demonstrates with the issuance of the Further Notice of Inquiry (FNOI) regarding the draft statement of work (SOW) for a new IANA Functions contract. Nokia Siemens Networks is pleased to respond with the brief comments that follow.

Nokia Siemens Networks is a leading supplier of telecommunications infrastructure for network operators and other communications service providers globally. Of the 100 largest operators in the world, 75 are our customers in 150 countries. Nokia Siemens Networks also is an active member of the Internet community with several years of significant contributions in organizations such as IETF, IAB and ICANN.

As a company, Nokia Siemens Networks is a strong supporter of the multi-stakeholder model with inclusive bottom-up policy processes and high transparency. As such, we support NTIA's stated commitment to maintaining the multi-stakeholder processes on the issue of IANA functions and Internet governance. In a similar vein, Nokia Siemens Networks supports the notion that future modifications to the IANA functions contract and changes to IANA related policies be conducted in an open and transparent process. We feel that such an open process is important in maintaining a mutually beneficial working relationship between all involved parties.

We continue to believe that development, standardization and governance of the Internet should stay with the current organizations responsible for these areas. Additionally, the IANA functions should continue to be directed and guided by the IAB and IETF. We agree with NTIA's conclusion that the core IANA functions should remain bundled under one entity as to avoid increased complexity and overhead costs. This will allow that entity to take advantage of the various synergies and interdependencies between the functions, enabling greater cooperation among stakeholders participating in the policy development and use of IANA services.

Nokia Siemens Networks has yet to fully consider the implications of separating the INT TLD management function from the other IANA functions; however we appreciate the framework that NTIA has set up in order to have a transparent public discussion on this issue next year and hope that all future modifications follow a similar model.

With best regards,

Tero Mustala  
Principal Consultant, Internet Affairs  
CTO Office  
Nokia Siemens Networks

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Head of Government Relations, North America  
Nokia Siemens Networks